

### Background

The Prison Rape Elimination Act (PREA) was unanimously passed in 2003 by the United States Congress, creating the National Prison Rape Elimination Commission and charging the Commission with researching and drafting standards for eliminating prison rape. The draft standards were published in 2009 and delivered to the Department of Justice, forming the basis for proposed final rules for PREA compliance. The final PREA standards for implementation became effective on August 20, 2012. The purpose of the PREA and its implementing rules is to provide a set of standards to prevent, detect, and eliminate sexual assault and sexual harassment of individuals residing in covered facilities. These standards apply to The Connection's community confinement facilities. In response to these standards, The Connection developed core policy establishing zero-tolerance for sexual abuse and sexual harassment and additional policies addressing the reporting of, and response to, all such allegations. These policies apply to the following programs: Sierra Center Pre-Trial, Sierra Center Work Release, Roger Sherman House, Cochegan House, Connection House, Eddy Center, The January Center, and Women's RISE.

The PREA Coordinator works closely with the Department of Corrections, Community Supervision Support Services, and the Connecticut State Police to respond to all allegations involving potential client sexual abuse, client sexual harassment, staff sexual misconduct, and staff sexual harassment in the above listed community confinement facilities. Staff and clients are educated on the agency's zero tolerance policy, the multiple avenues for reporting allegations, the appropriate response to allegations, and the agency's zero tolerance policy on retaliation. Any visitor entering the program receives information pertaining to sexual harassment and sexual abuse and their role in the program to report. Additionally, these programs, with the exception of The January Center, have a Memorandum of Understanding with the Connecticut Alliance to End Sexual Violence to provide services, support, advocacy, and counseling for clients who report that they have experienced sexual harassment or sexual abuse regardless of the outcome of any investigation. The services provided by the Alliance are free of charge to the client.

As an annual requirement, the PREA Coordinator reports all allegations and findings to the Department of Justice. Below you will find the definitions for the results of allegations. Additionally, the following pages include the Department of Justice's definitions of the allegation category with tables including totals of reported allegations by category.

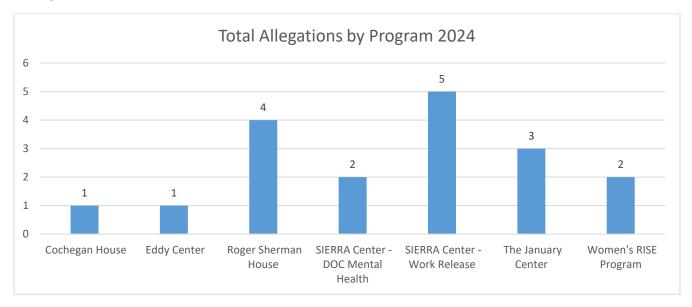
### Year in Review: 2024

In 2024, there were three (3) PREA Audits completed. The January Center, Cochegan House, and Sierra Pre-Trial programs were found compliant with the PREA standards and successfully passed the audit.

In 2024, there were a total of eighteen (18) PREA allegations in the Community Justice Residential programs listed above. Of the eighteen, two (2) were at Sierra Pre-Trial, five (5) were at Sierra Work Release, four (4) were at Roger Sherman House, three (3) were at The January Center, two (2) were at Women's RISE, one (1) was at The Eddy Center, and one (1) was at Cochegan House. Seven additional incidents occurred that did not

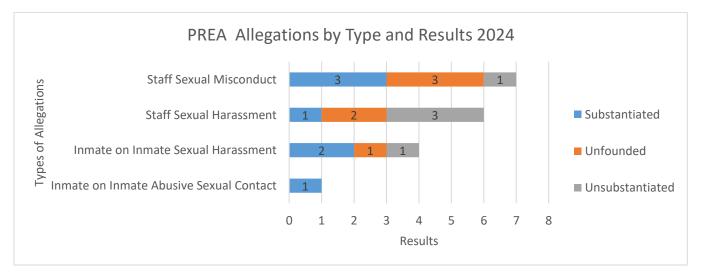


meet the definitions of sexual abuse or sexual harassment per the PREA standards, but which were reviewed and reported to the funder. No PREA allegations arose at the Connection House. The nature of the allegations and findings are summarized in the tables below.



#### **Outcome Definitions**

- **Substantiated allegation:** The allegation was determined to have occurred by a preponderance of evidence.
- **Unsubstantiated allegation:** The evidence was insufficient to make a final determination whether the allegation was true or false.
- **Unfounded allegation:** The allegation was determined not to have occurred.



The 2024 allegations included five (5) client-on-client allegations and thirteen (13) staff-on-client allegations. Seven additional allegations did not meet the legal definition of sexual abuse or sexual harassment per the PREA standards but were reviewed and reported to the funder (4 involving a staff-on-client and 3 involving a client-on-client).



### **Category Definitions**

#### • Client on Client Nonconsensual Sexual Acts

Sexual contact with any person without his or her consent, or with a person who is unable to consent AND contact between the penis and the vulva or penis and the anus including penetration, however slight OR contact between the mouth and penis, vulva, or anus OR penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument.

	Client on Client Nonconsensual Sexual Acts										
Finding	2020	2021	2022	2023	2024	Total					
Substantiated	0	0	0	0	0	0					
Unsubstantiated	0	0	1	0	0	1					
Unfounded	0	0	0	0	0	0					
Total	0	0	1	0	0	1					

#### • Client on Client Abusive Sexual Contact

Sexual contact with any person without his or her consent, or with a person who is unable to consent AND intentional touching, either directly or through clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person. Does not include any incident in which the sexual contact was incidental to a physical altercation.

	Client on	Client Abusiv	ve Sexual Co	ontact		
Finding	2020	2021	2022	2023	2024	Total
Substantiated	0	0	1	0	1	2
Unsubstantiated	1	0	1	0	0	2
Unfounded	1	0	1	0	0	2
Total	2	0	3	0	1	6

#### • Client on Client Sexual Harassment

Repeated and unwelcome sexual advances, request for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one client directed toward another.

	Client on Client Sexual Harassment									
Finding	2020	2021	2022	2023	2024	Total				
Substantiated	0	1	4	1	2	8				
Unsubstantiated	2	3	6	0	1	12				
Unfounded	1	0	0	0	1	2				
Total	3	4	10	1	4	22				



#### • Staff on Client Sexual Misconduct

Any behavior or act of a sexual nature directed toward a client by an employee, volunteer, contractor, official visitor, or other agency representative (exclude family, friend, or other visitors). Consensual and nonconsensual sexual acts include - Intentional touching, either directly or through clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks that is unrelated to official duties or with the intent to abuse, arouse, or gratify sexual desire OR completed, attempted, threatened, or requested sexual acts OR occurrences of indecent exposure, invasion of privacy, or staff voyeurism for reasons unrelated to official duties or for sexual gratification.

Staff on Client Sexual Misconduct									
Finding 2020 2021 2022 2023 2024 Total									
Substantiated	1	1	2	2	3	9			
Unsubstantiated	1	1	4	0	1	7			
Unfounded	0	1	2	1	3	7			
Total	2	3	8	3	7	23			

#### • Staff on Client Sexual Harassment

Repeated verbal statements, comments, or gestures of a sexual nature to a client by an employee, volunteer, contractor, official visitor, or other agency representative (exclude family, friends, or other visitors) Include - Demeaning references to gender; or sexually suggestive or derogatory comments about body of clothing OR repeated profane or obscene language or gestures.

	Staff on Client Sexual Harassment										
Finding	2020	2021	2022	2023	2024	Total					
Substantiated	0	0	2	1	1	4					
Unsubstantiated	0	0	0	2	3	5					
Unfounded	0	0	1	1	2	4					
Total	0	0	3	4	6	13					

### **Total Allegations by Program 2020-2024**

The Ja	anuary Center	2020	2021	2022	2023	2024
	Client on Client Nonconsensual Sexual Abuse	0	0	0	0	0
Vic	Client on Client Abusive Sexual Contact	1	0	0	0	0
Category	Client on Client Sexual Harassment	2	0	2	0	0
Cat	Staff on Client Sexual Misconduct	0	1	0	0	0
	Staff on Client Sexual Harassment	0	0	1	1	3
<u>It</u>	Substantiated	0	0	1	0	1
<u>Result</u>	Unsubstantiated	2	1	2	1	2
R	Unfounded	1	0	0	0	0
Total		3	1	3	1	3



Edda	Combon	2020	2021	2022	2022	2024
Eday	Center	2020	2021	2022	2023	2024
	Client on Client Nonconsensual Sexual Abuse	0	0	1	0	0
Jry	Client on Client Abusive Sexual Contact	0	0	1	0	0
Category	Client on Client Sexual Harassment	0	1	1	0	1
Cat	Staff on Client Sexual Misconduct	0	0	3	1	0
	Staff on Client Sexual Harassment	0	0	0	0	0
브	Substantiated	0	0	1	1	0
Result	Unsubstantiated	0	1	2	0	1
<b>B</b>	Unfounded	0	0	3	0	0
Total		0	1	6	1	1
Coch	egan House	2020	2021	2022	2023	2024
	Client on Client Nonconsensual Sexual Abuse	0	0	0	0	0
2V	Client on Client Abusive Sexual Contact	0	0	0	0	0
ategory	Client on Client Sexual Harassment	0	0	0	0	0
at	Staff on Client Source Misson dust	1	1	•	2	0

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Cate	Staff on Client Sexual Misconduct	1	1	0	2	0
	Staff on Client Sexual Harassment	0	0	1	1	1
<u>lt</u>	Substantiated	1	0	0	1	0
<u>Result</u>	Unsubstantiated	0	0	0	0	1
Ä	Unfounded	0	1	1	2	0
Total		1	1	1	3	1

Roger	Sherman House	2020	2021	2022	2023	2024
	Client on Client Nonconsensual Sexual Abuse	0	0	0	0	0
<u>Category</u>	Client on Client Abusive Sexual Contact	0	0	0	0	0
e B G	Client on Client Sexual Harassment	0	0	1	0	0
Cat	Staff on Client Sexual Misconduct	1	0	2	0	4
	Staff on Client Sexual Harassment	0	0	0	0	0
Ц	Substantiated	0	0	0	0	1
<u>Result</u>	Unsubstantiated	1	0	3	0	0
R	Unfounded	0	0	0	0	3
Total		1	0	3	0	4

Sierra	Center Pre - Trial	2020	2021	2022	2023	2024
	Client on Client Nonconsensual Sexual Abuse	0	0	0	0	0
<u>V</u> o	Client on Client Abusive Sexual Contact	0	2	0	0	0
Category	Client on Client Sexual Harassment	2	5	0	0	2
Cat	Staff on Client Sexual Misconduct	0	0	0	0	0
	Staff on Client Sexual Harassment	0	0	0	0	0
١٢	Substantiated	0	4	0	0	1
<u>Result</u>	Unsubstantiated	2	3	0	0	0
R	Unfounded	0	0	0	0	1
Total		2	7	0	0	2



Sierra	Center Work Release	2020	2021	2022	2023	2024
	Client on Client Nonconsensual Sexual Abuse	0	0	0	0	0
Category	Client on Client Abusive Sexual Contact	1	0	0	0	0
e Bo	Client on Client Sexual Harassment	1	1	0	1	0
Cat	Staff on Client Sexual Misconduct	0	1	3	0	3
	Staff on Client Sexual Harassment	0	0	1	2	2
비	Substantiated	0	2	2	2	2
<u>Result</u>	Unsubstantiated	1	0	2	1	1
ž	Unfounded	1	0	0	0	2
Total		2	2	4	3	5
Conn	Connection House					
COIIII	ection House	2020	2021	2022	2023	2024
Conn	Client on Client Nonconsensual Sexual Abuse	2020 0	2021 0	2022 0	2023 0	2024 0
		_				-
	Client on Client Nonconsensual Sexual Abuse	0	0	0	0	0
Category	Client on Client Nonconsensual Sexual Abuse Client on Client Abusive Sexual Contact	0	0	0	0	0
	Client on Client Nonconsensual Sexual Abuse Client on Client Abusive Sexual Contact Client on Client Sexual Harassment	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0
<u>Category</u>	Client on Client Nonconsensual Sexual Abuse Client on Client Abusive Sexual Contact Client on Client Sexual Harassment Staff on Client Sexual Misconduct	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0
<u>Category</u>	Client on Client Nonconsensual Sexual Abuse Client on Client Abusive Sexual Contact Client on Client Sexual Harassment Staff on Client Sexual Misconduct Staff on Client Sexual Harassment	0 0 0 0 0	0 0 0 0 0	0 0 0 0 0	0 0 0 0 0	0 0 0 0 0
	Client on Client Nonconsensual Sexual Abuse Client on Client Abusive Sexual Contact Client on Client Sexual Harassment Staff on Client Sexual Misconduct Staff on Client Sexual Harassment Substantiated	0 0 0 0 0 0	0 0 0 0 0 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0	0 0 0 0 0 0

Wome	en's RISE - Program opened on 7/1/2021.	2021	2022	2023	2024
	Client on Client Nonconsensual Sexual Abuse	0	0	0	0
ory	Client on Client Abusive Sexual Contact	0	0	0	1
Category	Client on Client Sexual Harassment	0	1	0	1
Cat	Staff on Client Sexual Misconduct	0	0	0	0
	Staff on Client Sexual Harassment	0	0	0	0
<u>It</u>	Substantiated	0	0	0	2
Result	Unsubstantiated	0	1	0	0
R.	Unfounded	0	0	0	0
Total		0	1	0	2

### **Identified Problem Areas and Corrective Actions**

The PREA standards require a "Sexual Abuse Incident Review" to be conducted within 30 days of the determination of the outcome of all substantiated and unsubstantiated allegations. Of the eighteen (18) allegations in 2024, six (6) were unfounded, five (5) were unsubstantiated and seven (7) were substantiated. Reviews of the twelve (12) unsubstantiated and substantiated incidents resulted in multiple recommendations. Recommendations included:

- Ensure staff access to agency database is limited to view records for clients that are only at the program where they work.
- Ensure program cameras are in all staff offices and community areas.



- The staff office and surrounding area should be reviewed, and locations identified for the placement of white noise generating machines to minimize the opportunities for staff conversations to be overheard by program clients.
- Staff will be reminded of the need to distribute the Visitors' Guide to PREA to all program visitors, especially client's friends and family members.
- Program leadership rolled out to current and new staff a Staff Boundaries Acknowledgment specific to all PREA Programs.
- Program managers of CJ Work Release/PREA Programs should ensure similar operational procedures as much as possible to promote consistency when staff are providing coverage at multiple programs
- Program Leadership will be directed to implement a camera footage review protocol so that the operations of the program and conduct of each staff is reviewed for random intervals, particularly during times when any staff has been the only who was working during a particular shift.

There were also recommendations related to staff training and supervision:

- In-person PREA Training was revised, updated and reinstated for bi-weekly sessions at each New Hire Orientation
- Enhancement of boundary training for all community confinement program staff;
- Program leadership to review with staff:
  - Boundaries, client manipulation and ethical behaviors in one-on-one supervisions and staff meetings;
  - That all allegations are required to be reported whether the client would like to file a PREA allegation, as it falls within Mandated Reporting laws, to ensure safety of clients;
  - The importance of staff presence where client bedrooms are located as well as monitoring cameras during shifts (especially third shift) to reduce the amount of clients entering other clients' bedrooms;

### **Assessment of Progress**

Starting in February 2024, the PREA Coordinators made updates to the yearly refresher training for all staff working in this agency's community confinement facilities and provided the training to all community confinement staff by May 2024. The PREA Coordinators additionally made significant updates for the training at orientation for new staff. The orientation training was reinstated bi-weekly in-person starting July 2024. This inperson training is required for all PREA compliant program staff as well as non-PREA compliant program's staff that typically cover shifts in PREA compliant programs. The PREA Coordinators created a one-page resource for management to provide an overview of requirements as a refresher, as well as a first responder one-page resource. All community confinement program staff will continue to adhere to the agency's PREA Policies and Procedures and remain compliant with the PREA standards. The following programs successfully passed their PREA Audits in 2024: Cochegan House, January Center, and Sierra Pre-Trial. The Eddy Center will be scheduled for an audit in 2025.

Elissa Viglione boxsign 4wirk9rp-4Lirjo7j	Jan 30, 2025
Elissa Viglione, PREA Coordinator	Date
box sign 4YW255QR-4LJRJQ7J	Jan 30, 2025
Lisa DeMatteis, Chief Executive Officer	Date